while he did not expect Ameritech's systems to be perfect, the sheer quantity of remaining errors while the systems are still functioning at relatively low volumes, as well as the type of errors, show that even Ameritech's ordering interface for resale POTS is not yet operational.

31.   Sam added that these problems are likely to pale in comparison to those likely to exist as Ameritech begins implementing other ordering capabilities. As Ameritech and CLECs have gained experience with Ameritech's ordering processes for resale POTS, Ameritech has at least made progress in reducing some of the problems it has had. However, Ameritech is only starting this process for ordering other types of services. In particular, it has very little, if any, experience using its EDI interface to order any complex services, such as Centrex or ISDN, for resale, or any unbundled elements or combinations of unbundled elements. These are vital to MCI's ability to compete, and the Ameritech provisioning process for these services is significantly more complicated than for the ordering of resale POTS. Ameritech also has little or no experience with its pre-ordering interface, its maintenance and repair interface, and its billing of CLECs for unbundled elements.

32.   Yet compared with other ILECs, Ameritech is actually relatively advanced. With the exception of an extremely limited test with USN that concluded at the end of March, Bell Atlantic has only recently begun carrier to carrier testing of any of its OSS. Bell Atlantic has not yet presented any data on the results of these tests, and, if MCI's own experience is any indication, that testing is likely to have revealed significant problems. As for the USN test, that test used 8 or 9 test customers; it did not test OSS for unbundled elements; it did not test the electronic bonding interface for maintenace and repair; it did not test processes for order

completion and jeopardy notification; and it revealed errors in order processing including incorrect billing numbers on collect calls.[1]

33.   BellSouth also has very limited experience with use of its OSS. Although BellSouth asserts that AT&T is now using its EDI interface for ordering, BellSouth has not presented any performance data indicating the success of that interface. MCI is highly dubious that the interface is being used successfully, since BellSouth's documentation on EDI remains incomplete (indeed, it first included unbundled elements in April). BellSouth also has not presented evidence of the operational readiness of its other interfaces. MCI has recently submitted test orders using BellSouth's LENS interface and has encountered significant difficulties, such as the inability to use Customer Service Records obtained at the pre-ordering stage for ordering and the disappearance of approximately 20% of orders in BellSouth's systems.

34.   Nynex has similarly provided little evidence to show the readiness of its OSS.'s EDI interface for ordering is not yet ready for testing with CLECs. The documentation for its EDI ordering interface is riddled with flaws, and, at least as of April, the interface was completely untested in carrier to carrier trials. Testing of the GUI for pre-ordering has

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[1]Bell Atlantic lambasts LCI for relying on a statement in Roberto Morson's affidavit in Pennsylvania that, as of March 6, Bell Atlantic "'was not yet able to provide even a demonstration of its pre-ordering interface.'" Bell Atlantic Comments, p. 8.   But as Mr. Morson explained in his reply affidavit in Pennsylvania, this statement was accurate. Prior to March 6, Bell Atlantic had only demonstrated the screens of ECG and a representation of ECG loaded on a laptop unconnected to any other computer. Bell Atlantic had not demonstrated a working ECG interface. Indeed, as of March 6, Bell told MCI that it could not yet provide such a demonstration.

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revealed lengthy delays in response times. At least as of April, Nynex admitted that none of

its OSS had yet been volume tested or stress tested.

35.   U.S. West's inappropriate interfaces are also not operationally ready. U.S.

West, like SWBT, Bell Atlantic and several other BOCs severely delayed testing of its OSS.

As limited testing has begun, problems have already become apparent. For example, several

MCI test customers have received letters thanking them **for choosing U.S. West**. In a

demonstration of U.S. West's IMA capabilities for pre-ordering attended by staff members of the

Colorado Public Utilities Commission, MCI was unable to validate some accurate addresses; was

not always able to retrieve CSRs or accurate addresses for each customer it checked, and was

delayed for hours after calling U.S. West to determine what the problems were. Other problems

with use of IMA have included lost orders, incorrect date stamping, and the fact that completion

reports do not include the MCI Purchase Order Number.

36.   As Sam King explained in his affidavit filed with this Commission, as of the time

that SWBT filed its Oklahoma § 271 application with the FCC, SWBT had not shown that those

of its interfaces that were acceptable on their face were operationally ready. SWBT admitted

that it had not used any of its automated interfaces with CLECs in a competitive environment, it

did not even seem to have tested most of these interfaces with CLECs; indeed, it did not even

provide internal test results showing that these systems will work. SWBT does not provide any

updated evidence of readiness here.

37.   In contrast to the fledgling efforts of other ILECs, there is a significant track record

by which to measure PacBell's OSS. That track record clearly demonstrates that PacBell's systems

are not operationally ready. From the first day that MCI and other CLECs began ordering resale

service, PacBell fell behind on orders. With respect to MCI's first 25,000 orders, PacBell never once returned a Firm Order Confirmation in less than 4 hours -- the interval to which it had previously committed. Even worse, PacBell was unable to complete orders in a reasonably timely fashion. Over the first six months of MCI's local service offering in California, the backlog of MCI orders grew, reaching nearly 7300 for residential customers in April of 1997. At the same time the backlog for MCI business orders reached 1,569 accounts. MCI customers regularly waited weeks and sometimes months for their phone service to be turned on or to be migrated to MCI. Only when MCI stopped actively selling local service did PacBell begin to catch up on the backlog.

38.   Even when customers in California were able to switch from PacBell to MCI, they frequently found that their directory listing had been dropped or that they lost dial tone with alarming frequency. These problems are caused by the fact that PacBell treats a migration to MCI as a disconnect of service and then a separate reconnection. And when the reconnection order is put through, all of PacBell's systems must be separately updated (often manually). Thus, the risk of error -- lost dial tone, dropped features, or lost directory listing -- is increased and, as MCI's experience shows, such errors happen all too frequently.
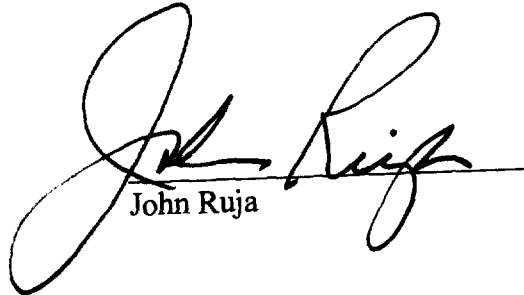
CONCLUSION

39.   The ILECs' panglossian pronouncements as to the status of their OSS are highly misleading. While some progress has been made, none of the ILECs yet has OSS ready to support real competition.

I, John Ruja, hereby depose and state that the statements contained herein are true and correct to the best of my knowledge, information and belief are true and correct copies of the original documents identified herein.

Dated: July 29, 1997

John Ruja

NOTARY

FALISHIA W. JORDAN
Notary Public District of Columbia
My Commission Expires: 10/31/99